REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE:

July 27, 2017

ANALYST:

Jaime Amrhein

I. COMMITTEE:

David Vitter for U.S. Senate

C00394593

William Vanderbrook, Treasurer 2900 Clearview Pkwy, Suite 206

Metairie, LA 70006

II. RELEVANT STATUTE:

11 CFR § 102.9(e) 11 CFR § 110.1(b)(3) 11 CFR § 110.2(b)(3)

III. BACKGROUND:

Excessive, Prohibited and Other Impermissible Contributions (Failure to Refund or Redesignate General Election Contributions within the Permissible Timeframe after the Candidate's Withdrawal from the Primary Election)

David Vitter for U.S. Senate ("the Committee") received 2016 General Election contributions from seventy-eight (78) individuals, two (2) limited liability companies, forty (40) multicandidate political action committees, and one (1) non-multicandidate political action committee that were not refunded or redesignated within the permissible timeframe from the date David B. Vitter ("the Candidate") withdrew from the 2016 Louisiana Primary Election. The contributions total \$237,650.00 as disclosed on the 2012 Year-End, 2013 April Quarterly, 2013 July Quarterly, 2013 October Quarterly, 2013 Year-End, 2014 April Quarterly, 2014 July Quarterly, 2014 October Quarterly, 2014 Year-End, 2015 April Quarterly, 2015 July Quarterly, 2015 October Quarterly, and 2015 Year-End Reports (Attachment 2).

2012 Year-End Report

On January 30, 2013, the Committee filed the 2012 Year-End Report, covering the period from October 1, 2012 to December 31, 2012 (Image 13020083425). This report disclosed the receipt of \$20,500.00 in 2016 General Election contributions from thirteen (13) individuals (Attachment 2).

2013 April Quarterly Report

On April 15, 2013, the Committee filed the 2013 April Quarterly Report, covering the period from January 1, 2013 to March 31, 2013 (Image 13020223042). The majority of this report had printing errors that made the itemized contributions illegible.

On April 26, 2013, the Reports Analysis Division (RAD) Analyst called the Committee's Treasurer, William Vanderbrook, to notify him of the illegible schedules on the report. Mr. Vanderbrook stated he would file an amended report to correct the error (Attachment 3).

On May 6, 2013, the Committee filed an Amended 2013 April Quarterly Report (Image 13020233631). This report disclosed the receipt of \$25,300.00 in 2016 General Election contributions from thirteen (13) individuals and four (4) multicandidate political action committees that were not refunded or redesignated within the permissible timeframe (Attachment 2).

On July 19, 2013, the Committee filed an Amended 2013 April Quarterly Report (Image 13020353296). This amended report disclosed a decreased amount for one (1) of the above 2016 General Election contributions, with no changes to the other contributions, and additional 2016 General Election contributions from twelve (12) individuals that were previously designated to the 2016 Primary Election. This report disclosed the receipt of a total of \$44,500.00 in 2016 General Election contributions from twenty-five (25) individuals and four (4) multicandidate political action committees that were not refunded or redesignated within the permissible timeframe (Attachment 2).

2013 July Quarterly Report

On July 15, 2013, the Committee filed the 2013 July Quarterly Report, covering the period from April 1, 2013 to June 30, 2013 (Image 13020323460). This report disclosed the receipt of \$28,500.00 in 2016 General Election contributions from seventeen (17) individuals and eight (8) multicandidate political action committees (Attachment 2).

On November 6, 2013, the Committee filed an Amended 2013 July Quarterly Report, which disclosed no changes to the above 2016 General Election contributions (Image 13020530764). This amended report disclosed additional 2016 General Election contributions from two (2) individuals and one (1) multicandidate political action committee that were previously designated to the 2016 Primary Election. This report

disclosed the receipt of a total of \$34,700.00 in 2016 General Election contributions from nineteen (19) individuals and nine (9) multicandidate political action committees (Attachment 2).

2013 October Quarterly Report

On October 15, 2013, the Committee filed the 2013 October Quarterly Report, covering the period from July 1, 2013 to September 30, 2013 (Image 13020480795). This report disclosed the receipt of \$20,550.00 in 2016 General Election contributions from seventeen (17) individuals and one (1) multicandidate political action committee (Attachment 2).

2013 Year-End Report

On January 31, 2014, the Committee filed the 2013 Year-End Report, covering the period from October 1, 2013 to December 31, 2013 (Image 14020111470). This report disclosed the receipt of \$23,200.00 in 2016 General Election contributions from nine (9) individuals, two (2) limited liability companies, and three (3) multicandidate political action committees (Attachment 2).

2014 April Quarterly Report

On April 15, 2014, the Committee filed the 2014 April Quarterly Report, covering the period from January 1, 2014 to March 31, 2014 (Image 14020252509). This report disclosed the receipt of \$3,000.00 in 2016 General Election contributions from two (2) individuals (Attachment 2).

2014 July Quarterly Report

On July 15, 2014, the Committee filed the 2014 July Quarterly Report, covering the period from April 1, 2014 to June 30, 2014 (Image 14020620078). This report disclosed the receipt of \$16,500.00 in 2016 General Election contributions from one (1) individual and six (6) multicandidate political action committees (Attachment 2).

2014 October Quarterly Report

On October 15, 2014, the Committee filed the 2014 October Quarterly Report, covering the period from July 1, 2014 to September 30, 2014 (Image 14020981054). This report disclosed the receipt of \$500.00 in 2016 General Election contributions from one (1) multicandidate political action committee (Attachment 2).

2014 Year-End Report

On January 30, 2015, the Committee filed the 2014 Year-End Report, covering the period from October 1, 2014 to December 31, 2014 (Image 15020080201). This

report disclosed the receipt of \$29,500.00 in 2016 General Election contributions from eight (8) multicandidate political action committees (Attachment 2).

On May 6, 2015, the Committee filed an Amended 2014 Year-End Report, which disclosed no changes to the above 2016 General Election contributions (Image 15020165136, Attachment 2).

2015 April Quarterly Report

On April 13, 2015, the Committee filed the 2015 April Quarterly Report, covering the period from January 1, 2015 to March 31, 2015 (Image 15020144299). This report disclosed the receipt of \$14,100.00 in 2016 General Election contributions from five (5) multicandidate political action committees (Attachment 2).

On July 20, 2015, the Committee filed an Amended 2015 April Quarterly Report, which disclosed no changes to the above 2016 General Election contributions (Image 201507220200230005). This amended report disclosed an additional 2016 General Election contribution from one (1) non-multicandidate political action committee that was previously designated to the 2016 Primary Election. This report disclosed the receipt of a total of \$16,400.00 in 2016 General Election contributions from five (5) multicandidate political action committees and one (1) non-multicandidate political action committee (Attachment 2).

2015 July Quarterly Report

On July 15, 2015, the Committee filed the 2015 July Quarterly Report, covering the period from April 1, 2015 to June 30, 2015 (Image 201507200200212746). This report disclosed the receipt of \$11,000.00 in 2016 General Election contributions from four (4) multicandidate political action committees (Attachment 2).

On September 11, 2015, the Committee filed an Amended 2015 July Quarterly Report, which disclosed no changes to the above 2016 General Election contributions (Image 201509140200239971, Attachment 2).

2015 October Quarterly Report

On October 9, 2015, the Committee filed the 2015 October Quarterly Report, covering the period from July 1, 2015 to September 30, 2015 (Image 201510140200255819). This report disclosed the receipt of \$5,000.00 in 2016 General Election contributions from one (1) multicandidate political action committee (Attachment 2).

2015 Year-End Report

On January 29, 2016, the Committee filed the 2015 Year-End Report, covering the period from October 1, 2015 to December 31, 2015 (Image 201602030200055129).

This report disclosed the receipt of \$12,300.00 in 2016 General Election contributions from one (1) individual and five (5) multicandidate political action committees (Attachment 2).

On November 21, 2015, the Candidate announced he will no longer seek reelection to the U.S. Senate in 2016.

On April 12, 2016, a Request for Additional Information (RFAI) referencing the 2015 Year-End Report was sent to the Committee. Among other issues, the RFAI noted the Committee's receipt of 2016 General Election contributions and requested the Committee refund or redesignate the contributions since the Candidate would not participate in the 2016 General Election (Image 201604120300041544).

On April 13, 2016, Mr. Vanderbrook called the RAD Analyst regarding the 2016 General Election contributions cited in the RFAI. Mr. Vanderbrook explained the Committee had not refunded any General Election contributions and did not believe they were required to since Louisiana uses an "open primary" election system. The RAD Analyst explained the Commission considers the ballot access deadline to be the primary election and the "open primary" to be the general election in Louisiana. Since the Candidate would not participate in the election which the Commission considers to be the general election, the Analyst advised the Committee was required to refund the 2016 General Election contributions they had received. Mr. Vanderbrook stated the Committee disagrees and would seek legal guidance from their counsel on this matter. The Analyst recommended the Committee file a statement on the public record to respond to the RFAI (Attachment 3).

On May 24, 2016, the Committee filed a Miscellaneous Paper Document ("FEC Form 99") that stated, in part:

"Your question regarding general election funds is not reflective of Louisiana's unique runoff election system, discussed by the Commission in AO 2000-29. At the time the committee's funds were spent in 2015, Senator Vitter was considered to be a general election candidate under Louisiana law and FEC rules and it was permissible therefore to spend such general election funds" (Image 201605240200186067).

On July 27, 2016, the RAD Analyst called Mr. Vanderbrook to inform him that RAD consulted with the Office of General Counsel (OGC) and received guidance that the Committee must refund the General Election contributions. The Analyst informed Mr. Vanderbrook the Committee could submit a Request for Consideration of a Legal Question to the Commission or the Committee would be referred by RAD for further action if the General Election contributions are not refunded. Mr. Vanderbrook stated he would review the Committee's options with their legal counsel (Attachment 3).

On August 17, 2016, the Committee submitted a Request for Consideration of a Legal Question to the Commission (LRA 1027). On October 25, 2016, the Commission

concluded the Committee is required to refund all 2016 General Election contributions received by the Committee. On October 31, 2016, OGC notified the Committee of the Commission's decision.¹

On November 3, 2016, the RAD Analyst spoke to Charlie Spies, the Committee's legal counsel, and explained the Committee's options after the Commission's decision on their Request. The Analyst informed the Committee that it will be referred to another office for further action for the 2016 General Election contributions not refunded. Mr. Spies stated the Committee may be able to make refunds of some General Election contributions using their available cash on hand. The Analyst explained RAD would take any refunds into consideration for the referral (Attachment 3).

On November 17 and 18, 2016, Mr. Spies and the RAD Analyst discussed the Committee's decision to refund as many General Election contributions as possible using their remaining cash on hand. Mr. Spies advised the Committee also expects to receive further restitution payments from the Department of Justice for a prior case where a vendor embezzled Committee funds. He stated the Committee plans to use the restitution payments to refund more General Election contributions (Attachment 3).

On January 10, 2017, the RAD Analyst called Mr. Spies about the status of the Committee's 2016 General Election contribution refunds. Mr. Spies explained they had made refunds using all their available cash on hand at this time, but they had not yet received any further restitution payments. He advised the Committee intends to continue refunding the General Election contributions using funds from any future restitution payments. The RAD Analyst advised the refunds already made should be disclosed on the Committee's next report and recommended the Committee file a statement on the public record explaining their intentions to make further refunds (Attachment 3).

On January 31, 2017, the Committee filed the 2016 Year-End Report, covering the period from October 1, 2016 to December 31, 2016 (Image 201702030200057888). This report disclosed refunds made within the permissible timeframe of \$81,800.00 in 2016 General Election contributions from thirty-six (36) individuals, six (6) limited liability companies, and nine (9) multicandidate political action committees.

On April 14, 2017, the Committee filed the 2017 April Quarterly Report, covering the period from January 1, 2017 to March 31, 2017 (Image 201704180200115190). This report disclosed memo text that stated:

"Per understanding with the report analyst division [sic] of the FEC, the committee is continuing to refund 2016 general election contributions. Over 75,000 was refunded in 2016 and the timing of future refunds is contingent upon the US Dept. of Justice making additional committee funds available from a vendor's embezzlement case" (Image 201704180200115194).

Documents relating to LRA 1027 are available at https://transition.fec.gov/law/legalconsideration.shtml.

To date, no further communications have been received from the Committee regarding this matter.

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Page 1 of 2

Page 2 of 2

Attachment 1

O-Index

David Vitter for U.S. Senate (C00394593)
2016 General Election Contributions Not Refunded and/or Refunded Outside Permissible Timeframes, Listed by Contributor

Sumay	and	Compathorhan.	Amount Not Refunded within Trefunded #Dityssince	mded # Daystsinger & drawal from Race
ADAMS, BRUCE	2/14/2013	\$1,500.00	\$1,500.00	N/A
ALLEN TRUCKING LLC	10/24/2013	\$400.00	\$400.00	N/A
ALLEN, CLAY	9/11/2013	\$1,000.00	\$1,000.00	N/A
ALLISON, DONALD	5/29/2013	\$400.00	\$400.00	N/A
ALPHA NATURAL RESOURCES PAC	5/29/2013	\$4,000.00	\$4,000.00	N/A
AMERICAN CONCRETE PIPE ASSN. PAC	6/30/2014	\$1,000.00	\$1,000.00	N/A
AMERICAN COUNCIL OF ENGINEERING (ACEC)	6/30/2014	\$1,000.00	\$1,000.00	N/A
AMERICAN ELECTRIC POWER COMMITTEE	5/29/2013	\$250.00	\$250.00	N/A
ANDERSON, HENRY	3/29/2013	\$1,000.00	\$1,000.00	N/A
AUER, FRANK	9/11/2013	\$1,000.00	\$1,000.00	N/A
BAUGH, SHERRY	9/9/2013	\$1,400.00	\$1,400.00	N/A
BELK, ROBERT	5/31/2013	\$2,000.00	\$2,000.00	N/A
BENNETT, ROBIN	9/3/2013	\$700.00	\$700.00	N/A
BOURGEOIS, GERARD	9/11/2013	\$250.00	\$250.00	N/A
BOYCE, CLARK	3/20/2013	\$2,500.00	\$2,500.00	N/A
CALLAWAY, JOE	3/31/2013	\$1,000.00	\$1,000.00	N/A
CASH AMERICA INTERNATIONAL INC.	10/30/2014	\$500.00	\$500.00	N/A
CAVE, J PATRICK	3/29/2013	\$400.00	\$400.00	N/A
CELANESE CORPORATION PAC	3/24/2015	\$5,000.00	\$5,000.00	N/A
CEMEX, INC. EMPLOYEES PAC	3/22/2013	\$2,500.00	\$2,500.00	N/A
CEMEX, INC. EMPLOYEES PAC	3/29/2013	\$2,500.00	\$2,500.00	N/A
CHEMTURA CORPORATION PAC	2/18/2015	\$2,300.00	\$2,300.00	N/A
CHOATE, ARTHUR	6/10/2013	\$2,600.00	\$2,600.00	N/A
CITIZENS FOR PROSPERITY IN AMERICA TODAY	6/24/2015	\$5,000.00	\$5,000.00	Z/A
CLARK, ELLOINE	12/31/2013	\$2,000.00	\$2,000.00	N/A
CLARK, WILLIAM	2/27/2013	\$1,500.00	\$1,500.00	N/A

Attachment 2

COALPAC	3/22/2013	\$1,000.00	\$1,000.00	N/A
COAL PAC	5/14/2013	\$1,000.00	\$1,000.00	N/A
COMMON VALUES PAC	12/12/2014	\$5,000.00	\$5,000.00	N/A
CORMACI, MICHAEL	1/31/2013	\$500.00	\$500.00	N/A
CORMACI, MICHAEL	2/28/2013	\$500.00	\$500.00	A/A
CORMACI, MICHAEL	3/31/2013	\$500.00	\$500.00	A/A
DANE, JOHN III	3/11/2013	\$500.00	\$500.00	N/A
DAUTERIVE, AUBRY	5/28/2013	\$1,200.00	\$1,200.00	A/X
DAUTERIVE, AUBRY	9/11/2013	\$1,000.00	\$1,000.00	N/A
DEFEND AMERICA PAC	12/22/2014	\$5,000.00	\$5,000.00	N/A
DEGUEYTER, FLOYD	9/11/2013	\$500.00	\$500.00	Α/Ν
DEMPSEY, JIMMY	9/11/2013	\$500.00	\$200.00	N/A
DEMPSEY, JIMMY	12/17/2013	\$1,000.00	\$1,000.00	N/A
DUPRE, REGGIE	9/11/2013	\$400.00	\$400.00	N/A
ECOLAB INC. PAC	3/13/2015	\$1,500.00	\$1,500.00	N/A
ENTERGY CORPORATION PAC (ENPAC)	11/23/2015	\$5,000.00	\$5,000.00	N/A
EXXON MOBIL CORPORATION PAC	9/16/2015	\$5,000.00	\$5,000.00	N/A
FINANCIAL SERVICE CENTERS OF AMERICA	3/13/2015	\$2,500.00	\$2,500.00	N/A
FREEDOM FUND PAC	12/5/2014	\$5,000.00	\$5,000.00	N/A
GAGLIANO, SHERWOOD	5/29/2013	\$400.00	\$400.00	N/A
GAMBLE, DENNY	3/29/2013	\$100.00	\$100.00	N/A
GRAVES, JOHN	5/29/2013	\$400.00	\$400.00	N/A
GRIZZLE, CHARLES	7/16/2013	\$1,500.00	\$1,500.00	N/A
GULF STATES TOYOTA, INC PAC	7/29/2013	\$2,000.00	\$2,000.00	N/A
HAMER, GREGORY	4/30/2013	\$2,000.00	\$2,000.00	A/A
HANKS, BRYAN	11/16/2012	\$2,000.00	\$2,000.00	N/A
HEARNE, HENRY	2/14/2013	\$2,000.00	\$2,000.00	N/A
HEARNE, HENRY	3/29/2013	\$500.00	\$500.00	N/A
HELLER HIGHWATER PAC	12/17/2014	\$2,500.00	\$2,500.00	N/A
HURT, JEFFREY	10/24/2013	\$2,400.00	\$2,400.00	A/A
HUVAL, DAVID	2/3/2014	\$500.00	\$200.00	N/A
I.C.R. CONTRACTING LLC	10/24/2013	\$500.00	\$500.00	A/A
ICPI PAVERPAC INTERLOCKING CONCRETE PAVEMENT INSTITUTE	11/23/2015	\$500.00	\$500.00	N/A
INTL UNION OF PAINTERS & ALLIED TRADES	12/26/2013	\$2,500.00	\$2,500.00	N/A

Attachment 2

INTL UNION OF PAINTERS & ALLIED TRADES	5/9/2014	\$2,500.00	\$2,500.00	N/A
JANIS, MARTIN	1/30/2013	\$1,000.00	\$1,000.00	N/A
JEANSONNE, I V	9/3/2013	\$500.00	\$500.00	N/A
JONES WALKER PAC	6/30/2013	\$1,500.00	\$1,500.00	N/A
JORDAN, STEVE	11/16/2012	\$1,000.00	\$1,000.00	N/A
KOCH INDUSTRIES INC PAC	6/30/2014	\$5,000.00	\$5,000.00	N/A
KOHUT, PETER	10/24/2013	\$600.00	\$600.00	N/A
KROHN, TRACY	11/2/2012	\$2,500.00	\$2,500.00	N/A
LAMAR, CHARLES	6/28/2013	\$400.00	\$400.00	N/A
LANE, C CHARLES	3/27/2013	\$400.00	\$400.00	N/A
LANE, C CHARLES	5/14/2013	\$750.00	\$750.00	N/A
LEBLANC, CLIFFORD	3/29/2013	\$1,000.00	\$1,000.00	N/A
LEE, THOMAS	6/28/2013	\$400.00	\$400.00	N/A
LIPSEY, RICHARD	6/28/2013	\$400.00	\$400.00	N/A
LIPSITZ, MELVIN	12/31/2013	\$2,000.00	\$2,000.00	N/A
LOUISIANA VALUES PAC	3/31/2015	\$5,000.00	\$5,000.00	N/A
LYONDELL CHEMICAL COMPANY PAC	5/4/2015	\$4,000.00	\$4,000.00	N/A
LYONDELL CHEMICAL COMPANY PAC	11/18/2015	\$1,000.00	\$1,000.00	N/A
MADDEN, JAMES	3/29/2013	\$400.00	\$400.00	N/A
MARTIN, ROY	3/11/2013	\$900.00	\$900.00	N/A
MARTIN, ROY	8/21/2013	\$1,700.00	\$1,700.00	N/A
MCBRIDE, CHARLIE	2/5/2013	\$500.00	\$500.00	N/A
MCMORAN EXPLORATION CO PAC	3/22/2013	\$5,000.00	\$5,000.00	N/A
MCSHERRY, MICHAEL	6/17/2014	\$1,000.00	\$1,000.00	N/A
MELANCON, MICHAEL	11/1/2012	\$2,500.00	\$2,500.00	N/A
MICROSOFT CORPORATION POLITICAL ACTION COMMITTEE	10/6/2015	\$2,500.00	\$2,500.00	N/A .
MILLER, ROBERT	3/31/2013	\$2,500.00	\$2,500.00	N/A
MOCKLER, PATRICK	11/1/2012	\$2,500.00	\$2,500.00	N/A
MOCKLER, TIMOTHY	11/1/2012	\$1,000.00	\$1,000.00	N/A
MOMENTIVE SPECIALTY CHEMICALS INC PAC	3/31/2015	\$100.00	\$100.00	N/A
MORAN, FRANK	5/28/2013	\$600.00	\$600.00	N/A
MOSING, DONNA	9/30/2013	\$2,400.00	\$2,400.00	N/A
MOSING, GREG	9/30/2013	\$2,400.00	\$2,400.00	N/A
MURRAY ENERGY PAC	10/24/2013	\$5,000.00	\$5,000.00	N/A
NELKIN, KENNY	5/20/2013	\$2,600.00	\$2,600.00	Y/Z

Attachment 2

NICHOLS, ROBERT	2/14/2013	\$2,500.00	\$2,500.00	N/A
	11/1/2012	\$1,000.00	\$1,000.00	N/A
NOREM, RICHARD	2/20/2013	\$1,500.00	\$1,500.00	N/A
NORTHROP GRUMMAN PAC	2/5/2013	\$1,000.00	\$1,000.00	N/A
NORTHROP GRUMMAN PAC	5/14/2013	\$3,000.00	\$3,000.00	N/A
NUSTARPAC .	6/30/2014	\$5,000.00	\$5,000.00	N/A
ODEN, RAY	3/29/2013	\$400.00	\$400.00	A/A
OKREPKI, RICHARD	3/31/2013	\$2,000.00	\$2,000.00	A/A
ORRINPAC	12/30/2014	\$5,000.00	\$5,000.00	N/A
OXBOW CARON & MINERALS HOLDINGS, INC.	11/6/2013	\$1,000.00	\$1,000.00	V/Z
PALMER, JOHN	2/7/2013	\$2,000.00	\$2,000.00	N/A
PALMER, JOHN	3/29/2013	\$400.00	\$400.00	N/A
PELLERIN, CURTIS	1/31/2014	\$2,500.00	\$2,500.00	N/A
PICCIOLA, JOSEPH	11/1/2012	\$2,000.00	\$2,000.00	N/A
POE, WILLIAM	2/14/2013	\$1,000.00	\$1,000.00	N/A·
POE, WILLIAM	6/28/2013	\$1,000.00	\$1,000.00	A/Z
POE, WILLIAM	12/17/2013	\$500.00	\$500.00	Y/Z
PROPERTY CASUALTY INSURERS ASSOC(PCIPAC)	5/8/2015	\$1,000.00	\$1,000.00	N/A
PROPERTY CASUALTY INSURERS ASSOCIATION OF AMERICA PAC	11/18/2015	\$1,000.00	\$1,000.00	N/A
RAYTHEON PAC	6/20/2013	\$1,000.00	\$1,000.00	N/A
RAYTHEON PAC	10/30/2014	\$1,500.00	\$1,500.00	A/Z
REILLY, KEVIN JR	6/28/2013	\$1,600.00	\$1,600.00	N/A
RELY ON YOUR BELIEFS FUND	12/11/2014	\$5,000.00	\$5,000.00	Y/Z
RESCHINI, JOSEPH	10/24/2013	\$2,400.00	\$2,400.00	A/Z
RICE, MATTHEW	10/24/2013	\$2,400.00	\$2,400.00	. V/ V
RICHARDSON, RICHARD	9/9/2013	\$1,400.00	\$1,400.00	N/A
RICHARDSON, RICHARD SR	9/9/2013	\$1,400.00	\$1,400.00	N/A
ROSS, STEPHEN M	10/5/2015	\$2,300.00	\$2,300.00	N/A
ROUSE, DONALD	11/1/2012	\$1,000.00	\$1,000.00	N/A
SEAFARERS POLITICAL ACTIVITY PAC	6/30/2013	\$2,500.00	\$2,500.00	Y/Z
SIERRA NEVADA CORPORATION PAC	6/30/2014	\$1,000.00	\$1,000.00	A/Z
SMITH, KENNETH	11/1/2012	\$1,000.00	\$1,000.00	N/A
SPOHN, CRAIG	5/29/2013	\$400.00	\$400.00	N/A
SPOHN, CRAIG	6/24/2013	\$1,000.00	\$1,000.00	N/A
ST ROMAIN, TODD	9/17/2013	\$500.00	\$500.00	A/Z

Attachment 2

SVENDSON, WADE MARTIN	6/28/2013	\$1,000.00	\$1,000.00	N/A
TATE, STANLEY	11/9/2012	\$500.00	\$500.00	ΥZ
THE DOW CHEMICAL CO. EMPLOYEES PAC	4/15/2013	\$1,000.00	\$1,000.00	A/Z
TRUCKING PAC	6/20/2013	\$500.00	\$500.00	N/A
TRUCKING PAC OF AMERICAN TRUCKING ASSOC.	6/30/2015	\$1,000.00	\$1,000.00	N/A
UNITED PARCEL SERVICES INC PAC (UPSPAC)	9/10/2014	\$500.00	\$500.00	N/A
WALTER, J.C.	11/1/2012	\$2,500.00	\$2,500.00	Y/A
WHELESS, NICK JR	5/29/2013	\$400.00	\$400.00	N/A
WILSON, PETER	2/7/2013	\$2,500.00	\$2,500.00	N/A
ZADECK, DONALD	11/2/2012	\$1,000.00	\$1,000.00	N/A
ZADECK, DONALD	2/14/2013	\$1,000.00	\$1,000.00	N/A
ZADECK, DONALD	5/29/2013.	\$400.00	\$400.00	N/A
ZUSCHLAG, RICHARD	12/3/2013	\$500.00	\$500.00	N/A
Total Minount Nor Refunded and or Refunded	f Outside Permissi	ole Timetrames = :	4.5. \$237.650:00	

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